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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

ONE DENVER PLACE — 999 18TH STREET — SUITE 1300

DENVER, COLORADO 80202-2413

AUG 21 1985

Ref: 8HWM-SR

MEMORANDUM

TO: Doug Skie, Chief (8MO)
Superfund and Hazardous Waste Section

FROM: Bill Geise, Chief (8HWM-SR) *Bill Geise*
Superfund Remedial Branch

SUBJECT: Response to August 7, 1985, Memo on Evaluation of Existing Data at
the BN Somers CERCLA Site

We concur with your proposed response to the issues raised in the subject memo. The following are comments specific to each issue:

Chain of Custody -

We concur with your proposal to waive the chain of custody requirement. Chain of custody documentation would be necessary if you suspected sample tampering. Future data should be collected using proper chain of custody procedures.

Method Validation -

We concur with your proposal to accept data analyzed by an alternative method only if that method is validated according to EPA procedures. If, however, the accuracy and precision of this method cannot be demonstrated to fall within acceptable limits, all past and future data using this method must be rejected.

QC Check Sample -

We concur with your proposal to waive the blanket recollection and reanalysis requirement in favor of "as needed" to support the EA and FS. The purpose of analyzing QC check samples and field spikes is to ensure that there are no interferences in the sample matrix that would cause the accuracy of the analyses to be unacceptable. Future QC data can be extrapolated to evaluate the accuracy of past data collected at this site.

If you wish to discuss these comments further, please contact me.

cc: Jim Lehr, ESD
Rex Calloway, RC

Bill Geise
8/21/85
10:30 AM